

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

CALEB BARNETT, et al.,)	Case No. 3:23-cv-209-SPM
Plaintiffs,)	**designated Lead Case
)	
v.)	
)	
KWAME RAOUL, et al.,)	
Defendants,)	
)	
DANE HARREL, et al.,)	Case No. 3:23-cv-141-SPM
Plaintiffs,)	
)	
v.)	
)	
KWAME RAOUL, et al.,)	
Defendants,)	
)	
JEREMY W. LANGLEY, et al.,)	Case No. 3:23-cv-192-SPM
Plaintiffs,)	
)	
v.)	
)	
BRENDAN KELLY, et al.,)	
Defendants,)	
)	
FEDERAL FIREARMS LICENSEES OF ILLINOIS, et al.,)	Case No. 3:23-cv-215-SPM
Plaintiffs,)	
)	
v.)	
)	
JAY ROBERT “J.B.” PRITZKER, et al.,)	
Defendants.)	
)	

**DECLARATION OF JOHN BOCH ON BEHALF OF
PLAINTIFF GUNS SAVE LIFE**

1. I, John Boch, am the Executive Director of Guns Save Life, Plaintiff in the above-titled action. I am over the age of 18 and I make this declaration of my own knowledge, except as to any matters stated therein on information and belief, and as to such matters I believe them

to be true. If called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. Guns Save Life (“GSL”) is an Illinois not-for-profit corporation, with its principal place of business in the State of Illinois.

3. GSL represents many members and/or supporters throughout the State of Illinois and in this judicial district in teaching and training them and others in proper and safe firearm possession and/or usage.

4. I have received, seen, or heard about communications from various GSL members and supporters who reside in Illinois complaining that they lawfully owned and possessed in Illinois prior January 10, 2023, firearms and parts that Protect Illinois Communities Act, House Bill 5471 (“PICA”) now restricts, which they can no longer enjoy the lawful use of because they refused to submit an endorsement affidavit for (i.e., register) those firearms or parts. I am aware of communications from various of those GSL members and supporters that but for fear of prosecution under PICA for doing so, they would have continued to possess and use within Illinois the firearms that PICA now restricts that they possessed prior to January 10, 2023 but did not register.

5. I am aware of communications from various GSL members and supporters who reside in Illinois complaining that they cannot lawfully acquire and possess firearms or parts that they want within Illinois because PICA forbids doing so. I am aware of communications from various of those GSL members and supporters that but for fear of prosecution under PICA for doing so, they would acquire and possess within Illinois firearms that PICA restricts as “assault weapons” and their related parts, including.

6. The number of GSL members who reside in Illinois and are affected by PICA for one or more of the reasons explained above are too many to identify, but I am aware of and provide the following individual as an example:

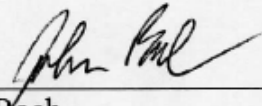
A. Todd Vandermyde is a current resident of Illinois and a member of Guns Save Life who is directly harmed by PICA by (1) losing the possession and use within

Illinois of various firearms and parts that he owns because he removed them from Illinois because PICA restricts them and he did not wish to submit an endorsement affidavit for (i.e., register) those firearms and parts; (2) being unable to obtain in Illinois certain replacement or alternative parts to use on his currently owned firearms that PICA restricts or for the purpose of building new firearms; (3) being unable to obtain in Illinois additional firearms he has been wanting to acquire for use in lawful purposes, such as self-defense; and (4) being forced to remove the threaded barrel from a handgun that he uses for self-defense in Illinois and spend money to purchase a new non-threaded barrel. Prior to January 10, 2023, Mr. Vandermyde owned and possessed at his home in Illinois firearms and parts that PICA restricts. He used those firearms and parts for various lawful purposes, including training, competition, and defense of himself, his family, his dogs (from coyotes), and his home. Not desiring to register his firearms and parts with the State, he has moved multiple firearms and parts that PICA restricts out of state for storage, including at least one: (a) semiautomatic AR-platform rifle that accepts detachable magazines and has a pistol grip, flash suppressor, barrel shroud, and adjustable stock; (b) semiautomatic pistol that accepts detachable magazines and has the capacity to accept the magazine outside of the pistol grip, a flash suppressor, and a barrel shroud (i.e., AR-Pistols); (c) threaded barrel for a semiautomatic pistol; (d) semiautomatic rifle chambered in .22LR because it accepts a detachable magazine and has a thumbhole stock; (e) semiautomatic shotgun that has a pistol grip; (f) semiautomatic shotgun that has a thumbhole stock; and (g) semiautomatic shotgun that has an internal magazine with a capacity to accept more than 5 rounds. But for fear of prosecution under PICA for doing so, Mr. Vandermyde would bring every firearm and part that he has removed from Illinois due to PICA back into Illinois. But for fear of prosecution under PICA for doing so, Mr. Vandermyde would acquire new firearms that PICA

restricts, including a Browning 1919, a Barret M82, an Armalite AR180, several AK types, and SVD Dragonov, several HK MP5 types; and would acquire new parts that PICA restricts, including pistol grips, stocks, barrel shrouds, and AR or AK receivers, to build new or modify already-owned rifles.

- B. I too removed firearms from Illinois that I owned and possessed in Illinois prior to PICA taking effect because I did not wish to submit an endorsement affidavit for (i.e., register) those firearms, including at least one AR-15 rifle, AR-15 pistol, and a semi-automatic shotgun with a pistol-grip. But for fear of prosecution under PICA, I would bring those firearms back to Illinois to possess and use for various lawful purposes, including self-defense and training.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed on July 12, 2024, in Bloomington, Illinois.



John Boch
Declarant

CERTIFICATE OF SERVICE

I hereby certify that on July 12, 2024, an electronic PDF of **DECLARATION OF JOHN BOCH ON BEHALF OF PLAINTIFF GUNS SAVE LIFE** was sent by electronic mail to the following registered attorneys participating in the case:

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Dated: July 12, 2024

s/ Laura Palmerin
Laura Palmerin